



2. Cease denying DAA treatment for the contraindications, other than patient refusal, set out in Step 4a of DPS Policy #CP-7 in the Health Services Policy and Procedure Manual.
3. Treat Plaintiffs and all members of their class with DAAs according to the current standard of medical care set out in the AASLD/IDSA guidelines, regardless of fibrosis level.

Under Local Rule 65.1(b), Plaintiffs request oral argument on this motion and leave to present the testimony of Dr. Andrew Muir, Chief of the Division of Gastroenterology at Duke University Hospital.

Respectfully submitted, this the 14th day of September, 2018.

/s/ Daniel K. Siegel  
Michele Luecking-Sunman  
N.C. Bar No. 31655  
Daniel K. Siegel  
N.C. Bar No. 46397  
North Carolina Prisoner Legal Services, Inc.  
P.O. Box 25397  
Raleigh, NC 27611  
(919) 856-2220  
mlueckingsunman@ncpls.org  
dsiegel@ncpls.org

/s/ Emily E. Seawell  
Christopher A. Brook  
N.C. Bar No. 33838  
Emily E. Seawell  
N.C. Bar No. 50207  
ACLU of North Carolina  
Legal Foundation  
P.O. Box 28004  
Raleigh, NC 27611  
(919) 834-3466  
cbrook@acluofnc.org  
eseawell@acluofnc.org

### **CERTIFICATE OF SERVICE**

I certify that on September 14, 2018, I served the foregoing using the CM/ECF system, which will send electronic notice to all counsel of record.

/s/ Daniel K. Siegel  
Daniel K. Siegel

*Attorney for Plaintiffs*